

1 JASON M. FRIERSON
United States Attorney
2 District of Nevada
Nevada Bar #7709
EDWARD G. VERONDA
3 Assistant United States Attorney
Edward.G.Veronda@usdoj.gov
4 501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
5 (702) 388-6336

6 Representing the United States of America

7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,) Case No. 2:20-cr-00230-KJD-DJA
9 Plaintiff,)
10 vs.) **Joint Stipulation to Continue Deadline
11 MICHAEL MOE,) for Government to Respond to Early
12 Defendant.) Termination Motion [ECF NO. 55]**
13 _____)

14 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
15 Frierson, Acting United States Attorney, and Edward G. veronda, Assistant United States
16 Attorney, counsel for the United States of America, and Heidi Ojeda, counsel for
17 MICHAEL MOE, that the deadline for the Government to respond to MOE's Motion for
18 Early Termination of Supervised Release (ECF No. 55) be extended for at least 4 weeks.

19 This Stipulation is entered into for the following reasons:

20 1. USPO Officer Warner informed the Government that Michael Moe
21 conducted a drug test after the filing of the early termination motion. USPO Officer Warner
22 also stated it would take several weeks before the results of the drug test were returned from
23 the laboratory. The Government would prefer to know the results of the drug test before
24 filing any opposition/non-opposition to the early termination motion.

3. MICHAEL MOE agrees with the need for the continuance.

4. The parties agree to the continuance.

This is the first request to extend the deadline to respond.

DATED this 16th day of February, 2024.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Heidi Ojeda
HEIDI OJEDA
Assistant Federal Public Defender
Counsel for Defendant MOE

/s/ Edward G. Veronda
EDWARD G. VERONDA
Assistant United States Attorney

1
2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

4 UNITED STATES OF AMERICA,

Case No. 2:20-cr-00230-KJD-DJA

5 Plaintiff,

6 **ORDER**

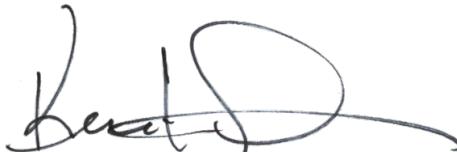
7 vs.

8 MICHAEL MOE,

9 Defendant.

10 Based on the stipulation of counsel, good cause appearing, and the best interest of
justice being served:

11 IT IS HEREBY ORDERED that the Government's Deadline to Respond to
12 Defendant's Motion for Early Termination be extended to March 22nd, 2024
13
14 DATED this 16th day of February, 2024.

15
16 
17 HONORABLE KENT J. DAWSON
18 UNITED STATES DISTRICT JUDGE